

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

JAMES ALDRIDGE, RELATOR,)
on behalf of the)
UNITED STATES OF AMERICA)
)
Plaintiff,)
)
v.) 1:16-CV-00369-HTW-LGI
)
H. TED CAIN, JULIE CAIN,)
CORPORATE MANAGEMENT INC.,)
STONE COUNTY HOSPITAL, INC.,)
THOMAS KULUZ, and)
STARANN LAMIER)
)
Defendants.)

MOTION TO WITHDRAW AS ATTORNEYS FOR H. TED CAIN

Attorneys Michael J. Bentley, W. Wayne Drinkwater, James Stephen Fritz, and the law firm of Bradley Arant Boult Cummings, LLP (collectively “Bradley”) file this motion for leave to withdraw from representation of Defendant H. Ted Cain (“Mr. Cain”) in this civil action.

In support of their motion, Bradley states as follows:

1. Bradley represents Mr. Cain and the other named defendants in this civil action.
2. Professional considerations require Bradley to terminate its representation of Mr. Cain and to seek leave to withdraw as counsel for Mr. Cain in this civil action.
3. Bradley has advised Mr. Cain that Bradley will be filing this motion.

4. Bradley is advised that their co-counsel, Ronnie Musgrove, also intends to file a motion for leave to withdraw from his representation of Mr. Cain in this civil action.

5. If the Court grants Bradley and Mr. Musgrove leave to withdraw, Mr. Cain will not have counsel in this civil action.

6. According, Bradley requests that the Court extend the time for Mr. Cain to respond to the Government's pending motion for contempt and continue the hearing that is currently set for May 15, 2023, to allow time for Mr. Cain to retain new counsel in this matter.

7. Bradley's request for leave to withdraw is limited to its representation of Mr. Cain. At this time, Bradley does not seek to withdraw from its representation of the other named defendants in this civil action.

8. Bradley has not conferred with counsel for the United States or counsel for the Relator James Aldridge, so Bradley does not know what position those parties might take on this motion.

9. Given the nature of this motion, Bradley requests relief from Local Rule 7(4)(b)'s requirement of a supporting memorandum brief.

For these reasons, Bradley respectfully seeks leave to withdraw from representation of Mr. Cain in this civil action.

Respectfully submitted: May 1, 2023.

s/ Michael J. Bentley
W. Wayne Drinkwater, MSB #6193
Michael J. Bentley, MSB #102631

James Stephen Fritz, Jr., MSB #105936
Bradley Arant Boult Cummings LLP
One Jackson Place
188 E. Capitol Street, Suite 1000
PO Box 1789
Jackson, MS 39201
Telephone: (601) 948-8000

Attorneys for Defendants Corporate Management, Inc. (“CMI”), Stone County Hospital, Inc., H. Ted Cain, Julie Cain, and Thomas Kuluz

CERTIFICATE OF SERVICE

I, Michael J. Bentley, an attorney for Defendants Corporate Management, Inc., Stone County Hospital, Inc., H. Ted Cain, Julie Cain, and Thomas Kuluz, certify that on May 1, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

I further certify that I delivered a copy of this motion by electronic mail to Defendant H. Ted Cain.

s/ Michael J. Bentley

Attorney for Defendants Corporate Management, Inc. (“CMI”), Stone County Hospital, Inc., H. Ted Cain, Julie Cain, and Thomas Kuluz